Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	GN Docket No. 25-133
Delete, Delete, Delete	)	

COMMENTS OF WORLDVU SATELLITES LIMITED

WorldVu Satellites Limited ("Eutelsat Group") respectfully submits these comments regarding the Federal Communications Commission's ("Commission's") Public Notice ("*Notice*") in the above-captioned proceeding.[1] Eutelsat Group supports the Commission's efforts to modernize and streamline its procedures for authorizing satellite earth stations and space stations, and the *Notice* presents a prime opportunity for the Commission to continue its efforts to bring satellite licensing into the New Space Age.

Eutelsat Group fully supports the Comments filed by the Satellite Industry Association in this proceeding and the Commission should consider changes to its Part 25 rules consistent with those comments. Additionally, the Commission should modify Section 25.118(f) regarding the repositioning of satellites in non-geostationary satellite orbit ("NGSO") systems without prior authorization.[2]

In the Commission's ongoing proceeding on *Expediting Initial Processing of Satellite and Earth Station Applications*, commenters, including Eutelsat Group, supported various changes to Section 25.118(f) to provide operators with greater flexibility regarding minor changes to the

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[1] *See Delete, Delete, Delete*, Public Notice, DA 25-219 (rel. Mar. 12, 2025) ("*Notice*").

[2] 47 C.F.R. § 25.118(f).

configuration of authorized NGSO systems without requiring full modification applications.[3] Eutelsat Group continues to support the changes to Section 25.118(f) that it proposed in that proceeding, including expanding the rule to allow NGSO operators to reposition satellites between authorized orbital planes and eliminating the requirement that the repositioning last no longer than 30 days.[4] However, the Commission can further streamline this rule by eliminating the requirement that operators provide prior notice to the Commission when repositioning satellites. The notification requirement imposes a significant regulatory burden on satellite operators with no commensurate public interest benefit. As such, the Commission should revise Section 25.118(f) as follows:

> **(f) Repositioning of NGSO space stations.** A licensee may reposition NGSO space stations within ***and between orbital planes*** ~~**an authorized orbital plane**~~ without prior ***notice or*** Commission approval, provided ***that*** ~~**the licensee notifies the Commission of the repositioning 10 days in advance by electronic filing on Form 312 in the International Communications Filing System. The notification must specify all changes in previously authorized parameters and must certify the following**~~:
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> (5) ~~**Any change of orbital altitude entailed by the repositioning will not exceed 10 kilometers in extent or 30 days in duration and the licensee has notified, or will notify**~~, ***the licensee notifies*** the operator(s) of any satellite within 20 kilometers of the ~~**interim**~~ ***repositioned*** orbit at least 10 days before commencing the repositioning maneuver.

Modifying Section 25.118(f) as proposed herein will enable operators to react quickly to changing requirements, meet evolving customer needs, allow for more efficient use of spare satellites, and may even lengthen the operational lifetime for individual satellites, all without

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[3] *See*, *e.g.*, Comments of Eutelsat Group, IB Docket Nos. 22-411, 22-271, at 7-9 (Jan. 8, 2024) ("Eutelsat Group Comments"); Reply Comments of Eutelsat Group, IB Docket Nos. 22-411, 22-271, at 5-6 (Feb. 6, 2024) ("Eutelsat Group Reply Comments"); Reply Comments of SES Americom, Inc. and O3b Limited, IB Docket Nos. 22-411, 22-271, at 4 (Feb. 6, 2024).

[4] *See* Eutelsat Group Comments at 7-9; Eutelsat Group Reply Comments at 5-6.

creating any cognizable public interest harm.[5] Further, by maintaining the requirements of Sections 25.118(f)(1)-(5) (with the changes proposed in these comments) the Commission can ensure that providing NGSO operators with additional flexibility to reposition their satellites does not present any significant risk to other operators.

Respectfully submitted,

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April 11, 2025

[5] Consistent with this proposal, the Commission should also consider allowing the operation of spare satellites without further approval or notification if those satellites are used to provide the same effective service as previously approved under an FCC authorization. *See* Eutelsat Group, *Modification to Market Access Grant*, ICFS File Nos. SAT-MPL-20230630-00157, SAT-APL-20240220-00036 (granted Mar. 14, 2025).